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June 4, 2007

**Via Email (sbull@mde.state.md.us)**

Susan Bull  
Maryland Department of the Environment  
Oil Control Program  
1800 Washington Boulevard – Suite 620  
Baltimore, MD 21230-1719

**Re:    Green Valley Citgo**

Dear Ms. Bull:

For the reasons articulated more fully below, Carroll Independent Fuel Company (“Carroll”) respectfully requests that your office reconsider your May 23 email drastically expanding the residential sampling in the Green Valley Citgo matter.

As you are aware, Carroll’s position in this matter is that, notwithstanding the fact that it is neither the owner nor operator of the UST system at Green Valley Citgo, it has been willing to lead the efforts on behalf of both of those parties. Your request for an additional 130 potable well samples is, at least to our knowledge, an unprecedented one in cases such as this.

Our initial view is that the request is excessive is buttressed by the fact that there are already open case files on releases at several addresses which are between the Green Valley Citgo’s site and the proposed sampling sites. Moreover, the request does not appear to be driven by the currently available sampling data. Our point-by-point response to your request follows below.

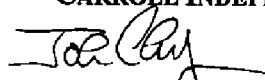
- **Blueberry Drive** - As per the 5/18/07 2:45 PM email, sampling efforts will be completed for the ¼ mile, an additional seven residents. Access requests have gone out, residents received them Saturday May 19, and to date three have been scheduled. Data received to date indicate that 3729 as non-detect and 3726 as 0.2 ppb. Since the ¼ mile will be satisfied, the movement to beyond this extent should be based on data, which is being collected. In addition, some of the addresses are beyond a ½ mile (3701, 3702, 3704). Without data to guide the investigation past a ¼ mile radius, this request sets a very dangerous precedent.
- **Barley Court** – As with Blueberry, the ¼ mile will be satisfied. Data should guide the investigation past this point.
- **Barn Road** – This is clearly outside of the ¼ mile and over the next few weeks samples will be collected from at least 15 residents between the Citgo and these addresses. Again data should guide the investigation.
- **Chaucer Court** – The 5/18/07 email will satisfy the ¼ mile. As with Barn Road, 11 samples will be collected between 3902, 3908, 3912, 3914, 3932, and 3940 and the Citgo. In addition, Chaucer Court is well within the ¼ mile for the Green Valley Garage open case. Why are they not completing the sampling?
- **Daisy Court** – Fine, as a portion of each property listed is within a ¼ mile, so we are remaining consistent on this street.
- **Green Ridge Drive** – The ¼ mile has been completed with the highest detection being 1.3 ppb for MtBE. Note this is 3837 which is the closest resident to the Citgo. Also, please note that the majority of the detections on Green Ridge Drive are 100 times below the standard for MtBE.
- **Farm Lane** – Will be sampled when the well becomes active.
- **Fingerboard Road** – Within a ¼ mile so consistent. Results have been received for 11711 and are non-detect.
- **Rosewood Road** – 3941, 3942 and 4001 are outside the ¼ mile. As per the 5/18 email, an additional eight residents will be sampled between these locations and the Citgo. CIFIC also feels that these eight are excessive as non-detect values have been seen in 3927, 3928, 3931 and 3933 locations which are closer to the Citgo. Please note that the shopping centers two supply wells are approximately 100 times below standard. Has the MDE factored that in?
- **Rye Lane** – The ¼ mile has been satisfied with the 5/18 email and the majority of the detections are below 1 ppb with three non-detects. Some of the locations in the cul-de-sac are close to the ½ mile with data not being the driver in the sample request.

- **Cove Court** – 4109 and 4107 are in very close proximity to the Tranquility Court investigation and the potable well impact area in which the MDE has installed POETs. Why is this Citgo's responsibility? A non-detect sample was collected at 11711 Serene Court which is between the Citgo and Cove Court.
- **Lynne Burke Road** – 4016 and 4019 will give the Citgo a two property data set north of the site of which the first properties 11713, 11712 and 11902 are below 1 ppb. The rest of the addresses are in the area of the Cameron Court investigation area that the MDE has determined to be separate from the Citgo case. Given this, why does Citgo have to complete this sampling?
- **Fingerboard Road** – 11946 is outside of the ¼ mile and close to Cameron Court. The same explanation for Rosewood (see above) applies.
- **Millbrooke Court** – If this is associated with Cameron Court, why is the MDE requesting Green Valley Citgo do this work?
- **Millbrooke Drive** – Same comment.
- **Serene Court** – 11710, 11708 and 11709 will provide the two property barrier in which 11711 was non-detect. As with Cove Court, the rest is within Green Valley Garages ¼ mile and should be conducted by them. Especially with 11703 and 11702 being connect to properties on Tranquility Court.
- **Tommy Court** – Adjacent to the Cameron Court investigation and should be part of that investigation. Also some properties are outside of the ¼ mile of the Citgo.
- **Thomas Spring Road** – 11795 would provide an additional property closest to the Citgo to add to the non-detect value at 11711 Serene Court and the below 0.5 ppb detections at 11712 and 11713 Serene Court locations. The rest are either outside the ¼ mile or adjacent to the Tranquility Court impact being managed by the MDE.

In sum, our request for reconsideration is based on the fact that the requested sampling is either not supported by data, outside the scope of customary and scientifically supported practices or is factually not related to the Green Valley Citgo site. We, along with our environmental consultant, will be most happy to discuss this matter with you further.

Respectfully submitted,

**CARROLL INDEPENDENT FUEL COMPANY**

  
John Phelps